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CRIMINAL LIABILITY OF A WIFE WHO PLANNED THE MURDER OF HER HUSBAND IN THE DECISION OF THE MEDAN DISTRICT COURT NUMBER 284/PID.B/2025/PN MDN

Revalino Perangin-Angin^{1*}, Halimatul Maryani²

¹Fakultas Hukum, Universitas Muslim Nusantara (UMN) Al Washliyah, Indonesia

Email: revalino281@gmail.com

²Fakultas Hukum, Universitas Muslim Nusantara (UMN) Al Washliyah, Indonesia,

Email: halimatul.maryani@umnaw.ac.id

Abstract

Based on the research results, it shows that the process and standard of proof of the element with premeditation in the crime of premeditated murder committed by a wife against her husband begins with collecting various evidence that supports the existence of a prior plan. Then the Judge conducts an objective evaluation of all the evidence and statements submitted. The judge's consideration in assessing the evidence and trial facts related to the motive in the premeditated murder case based on the Medan District Court Decision Number 284 / Pid.B / 2025 / PN Mdn is appropriate. The criminal liability of the wife who planned the murder of her husband based on Decision Number 284 is sentenced to 18 years in prison or 2 years lighter than the maximum prison sentence stipulated by Article 340 of the Criminal Code. The leniency of criminal liability is due to mitigating factors for the defendant, namely the defendant has children, one of whom is still in education.

Keywords: *Criminal Liability, Wife, Premeditated Murder, Husband*

1. INTRODUCTION

A murder case once shocked the community of Medan Helvetia District, as it attracted significant public attention because the victim was a husband named Rusman Maralen Situngkir and the perpetrator was his wife, Dr. Tiromsi Sitanggang, S.H., M.H., M.Kn., who possessed a relatively high educational background. The case surprised residents living around the victim's house, because after an in-depth investigation, it was revealed that the person who had planned the murder was the victim's own wife. Initially, the case was obscured by the wife's statement claiming that the victim had died as a result of a hit-and-run accident in front of their house. However, she did not report the incident to the police. Due to these irregularities, the victim's brother, Ir. Haposan Situngkir, filed a report with the Medan Helvetia Police Sector (Polsek Medan Helvetia) on suspicion of murder. Based on this report,

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the police conducted an investigation and inquiry, which ultimately concluded that the victim had been murdered and that the perpetrator was his own wife. In its decision, the panel of judges declared that the defendant had been legally and convincingly proven guilty of committing premeditated murder as stipulated under Article 340 of the Indonesian Criminal Code (KUHP) and sentenced her to 18 years of imprisonment. However, according to the researcher, there is an irregularity in the decision, namely that the panel of judges did not clearly explain the relationship between the element of “taking the life of another person” and the defendant’s actions.

2. METHODOLOGY

This study employs a normative juridical legal research method with a descriptive-analytical nature, aiming to describe and analyze applicable legal provisions and their implementation in law enforcement practice.

The statutory approach was conducted by examining various regulations related to the crime of murder, particularly the Indonesian Criminal Code, along with its implementing regulations. The case approach was carried out through an in-depth analysis of the Decision of the Medan District Court Number 284/Pid.B/2025/PN Mdn as the primary object of study. The data used in this research consist of secondary data, including primary legal materials, secondary legal materials, and tertiary legal materials. Primary legal materials include legislation and relevant court decisions. Secondary legal materials consist of books, scientific journals, and prior research related to murder and its law enforcement. Tertiary legal materials include legal dictionaries and legal encyclopedias. Data collection was conducted through library research.

Data analysis was performed qualitatively by interpreting legal norms and legal facts contained in the court decision. The results of the analysis are presented systematically to provide a comprehensive overview of the crime of murder.

3. RESEARCH FINDINGS AND DISCUSSION

The results of the research indicate that the process and standard of proof for the element of “prior planning” in a case of premeditated murder committed by a wife against her husband begins with collecting various forms of evidence supporting the existence of prior

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planning. Such evidence may include recorded conversations, text messages, letters, or other documents demonstrating the defendant's intent and preparation. This evidence must be obtained lawfully in accordance with legal procedures.

Subsequently, it must be proven that the evidence is relevant and reliable by examining its authenticity and accuracy through expert witnesses, fact witnesses, or other forms of evidence. Witnesses who are aware of or have observed the planning must be presented, such as individuals who heard conversations or saw preparations made by the defendant. Expert testimony may also be used to assess technical evidence, such as recordings or documents.

The judge must then objectively evaluate all evidence and testimonies presented, assessing whether they are sufficiently strong to prove that the defendant had planned the murder in advance with organized intent and deliberate steps.

In the trial process, the prosecutor must prove that the defendant had planned the murder beforehand, that the plan was systematic and mature rather than spontaneous, and that there was conscious preparation with the intent to carry out the killing.

The standard of proof applied in this case is "beyond a reasonable doubt," meaning that the evidence presented must be strong enough to convince the panel of judges that the defendant had indeed planned and systematically prepared the murder, leaving no significant doubt regarding the validity and relevance of the evidence.

Regarding the judge's considerations in assessing evidence and trial facts related to motive in the Medan District Court Decision Number 284/Pid.B/2025/PN Mdn, the considerations were generally appropriate. However, the evidence indicating that the defendant and Grippa Sihotang had committed premeditated murder was deemed insufficiently strong. For instance, no physical evidence of the murder weapon used by the defendant was presented, and Grippa Sihotang was not brought to trial because he had fled. As a result, doubt arose as to whether the victim truly died due to the defendant's previously planned act or whether the death resulted from a spontaneous altercation that led to the victim's death. Although the motive and intent of the defendant and Grippa Sihotang were supported by other trial facts, the absence of physical evidence weakened the proof of the concrete execution of the premeditated murder.

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Concerning criminal liability, the wife who planned her husband's murder, based on the Medan District Court Decision Number 284/Pid.B/2025/PN Mdn, was sentenced to 18 years of imprisonment. This sentence is lighter than the maximum penalty stipulated under Article 340 of the Criminal Code, which provides for life imprisonment or the death penalty.

The mitigating factors considered by the court included that the defendant had children, one of whom was still in school, and that the defendant was 58 years old. The imposition of an 18-year sentence reflects that the judge considered both the elements of guilt and the defendant's actions in planning and carrying out the murder.

Thus, the criminal liability imposed upon the wife in this case was decided in accordance with Article 340 of the Criminal Code and judicial considerations. The 18-year sentence demonstrates a balance between the defendant's culpability and mitigating factors, as well as considerations of justice and proportionality.

4. CONCLUSION

The conclusion regarding the criminal liability of the wife who planned her husband's murder in the Medan District Court Decision Number 284/Pid.B/2025/PN Mdn is that the defendant was declared guilty of committing premeditated murder and sentenced to 18 years of imprisonment. This sentence indicates that the judges considered the elements of guilt, trial facts, and both mitigating and aggravating factors, thereby imposing a punishment that is sufficiently severe yet proportional and consistent with applicable legal provisions.

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